## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

<b>United States of America</b>	)	
	)	No. 1:19-cr-142-LM
v.	)	
	)	FILED UNDER SEAL
Nathan Craigue	)	

## <u>Assented-to Motion to Seal United States' Objection to</u> <u>Defendant's Motion in Limine #5</u>

The United States of America, by Scott Murray, United States Attorney for the District of New Hampshire, respectfully asks this Court to issue an Order sealing the United States'

Objection to Defendant's Motion in Limine #5 (filed separately) at Level I, and all related docket entries, for the following reasons:

Local Rule 83.12(c) requires a motion to seal to be filed separately from the item(s) sought to have sealed, and to explain the reason why the item(s) should be sealed and the level at which they should be sealed.

The defendant filed Motion in Limine #5 under seal because in addressing the credibility of a government witness, he seeks to introduce materials that may be considered confidential pursuant to New Hampshire Revised Statute 281- A:21-b. Although the government does not attach any of the potentially confidential records to its response, it requests leave to file the response under seal to avoid publicly filing any confidential material, out of an abundance of caution. In addition, the filing discusses private medical and prescription history of the government witness at issue.

The defendant, through his counsel, Dorothy E. Graham, assents.

A supporting memorandum of law has not been filed because it is unnecessary in light of the nature of the relief requested.

Therefore, the government respectfully requests that this court issue an Order sealing the United States' Objection to Defendant's Motion in Limine #5 (filed separately), and all related docket entries.

Respectfully submitted,

SCOTT W. MURRAY United States Attorney

Dated: December 4, 2020 By: /s/Anna Dronzek

John Davis Anna Dronzek Aaron Gingrande Assistant United States Attorneys United States Attorney's Office 53 Pleasant Street, 4<sup>th</sup> Floor Concord, NH 03301 (603) 225-1552

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this pleading on Dorothy Graham, Esq., and Behzad Mirhashem, Esq., attorneys for the defendant, on December 4, 2020, by e-mail.

/s/ Anna Dronzek Anna Dronzek Assistant U.S. Attorney